

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

JOHAN A. VAN WEELDEN,

Plaintiff,

vs.

EQUAL ENERGY LTD., DON KLAPKO,
MICHAEL DOYLE, VICTOR DUSIK,
ROBERT WILKINSON, KYLE TRAVIS,
LEE CANAAN, MICHAEL COFFMAN,
PETROFLOW CANADA ACQUISITION
CORP., and PETROFLOW ENERGY
CORPORATION,

Defendants.

Civil Action No. 5:14-cv-00047-C

ANTHONY MONTEMARANO, Individually
and on Behalf of All Other Persons Similarly
Situated,

Plaintiff,

vs.

EQUAL ENERGY LTD., MICHAEL
DOYLE, LEE CANAAN, MICHAEL
COFFMAN, VICTOR DUSIK, DON
KLAPKO, KYLE TRAVIS, ROBERT
WILKINSON, PETROFLOW ENERGY
CORPORATION, and PETROFLOW
CANADA ACQUISITION CORP.,

Defendants.

Civil Action No. 5:14-cv-00058-C

CLASS ACTION

[Additional Captions Follow]

**DECLARATION OF JUAN E. MONTEVERDE IN SUPPORT OF GARRY MITINAS'
MOTION FOR (1) CONSOLIDATION, (2) APPOINTMENT AS LEAD PLAINTIFF,
AND (3) APPROVAL OF LEAD COUNSEL**

ANDREW COOKE, ON BEHALF OF THE
ANDREW R. COOKE 1998 TRUST,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiff,

vs.

EQUAL ENERGY LTD., PETROFLOW
ENERGY CORPORATION, PETROFLOW
CANADA ACQUISITION CORP.,
MICHAEL DOYLE, DON KLAPKO, LEE
CANAAN, MICHAEL COFFMAN, VICTOR
DUSIK, KYLE TRAVIS, and ROBERT
WILKINSON,

Defendants.

Civil Action No. 5:14-cv-00087-C

CLASS ACTION

JONATHAN SCRIPTURE, on Behalf of
Himself and All Others Similarly Situated,

Plaintiff,

vs.

EQUAL ENERGY LTD., DON KLAPKO,
MICHAEL DOYLE, VICTOR DUSIK,
ROBERT WILKINSON, LEE CANAAN,
MICHAEL COFFMAN, KYLE TRAVIS,
PETROFLOW ENERGY CORPORATION,
and PETROFLOW CANADA ACQUISITION
CORP.,

Defendants.

Civil Action No. 5:14-cv-00114-C

CLASS ACTION

I, Juan E. Monteverde, declare as follows:

1. I am a member in good standing of the bar of the State of New York. I am a partner with the law firm of Faruqi & Faruqi, LLP. I submit this declaration in support of the Garry Mitinas' motion for (1) consolidation; (2) appointment as Lead Plaintiff; and (3) approval of his selection of Faruqi & Faruqi, LLP to serve as Lead Counsel for the Class.

2. Attached hereto are true and correct copies of the following exhibits:

- Exhibit 1:* First Notice of Pendency of the Action;
- Exhibit 2:* Gary Mitinas' Private Securities Litigation Reform Act Certification;
- Exhibit 3:* Firm Resume of Faruqi & Faruqi, LLP;
- Exhibit 4:* Stipulation of Settlement in *In re Cogent, Inc. Shareholders Litigation*, No. 5780-VCP (Del. Ch. 2010);
- Exhibit 5:* [Corrected] Stipulation and Agreement of Compromise, Settlement and Release in *In re Playboy Enterprises, Inc. Shareholders Litigation*, No. 5632-VCN (Del. Ch. 2010);
- Exhibit 6:* Memorandum of Understanding in *In re Hearst-Argyle Shareholder Litigation*, No. 600926/2009 (N.Y. Sup. Ct. 2009);
- Exhibit 7:* Stipulation of Settlement in *In re Fox Entertainment Group, Inc. Shareholders Litigation*, No. 1033-N (Del. Ch. 2005);
- Exhibit 8:* Order After Hearing [Plaintiff's Motion for Preliminary Injunction; Motions to Seal] granted in *Knee v. Brocade Communications Systems, Inc.*, No. 1-12-CV-220249 (Cal. Super. Ct. Apr. 10, 2012) (Kleinberg, J.);
- Exhibit 9:* Stipulation of Settlement and Agreement of Compromise, Settlement and Release in *In re McCormick & Schmick's Shareholder Litigation*, No. 7058-VCL (Del. Ch. 2011); and
- Exhibit 10:* Stipulation of Settlement in *In re International Coal Group, Inc., Shareholders Litigation*, No. 6464-VCP (Del. Ch. 2011).

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed this 31st day of March, 2014 at New York, New York.

/s/ Juan E. Monteverde
Juan E. Monteverde